

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE: _____ :

LUIS M ROBLES BERRIOS : **CASE NO. 14-06937-BKT**

Debtors : **CHAPTER 13**

_____ :

DEBTORS' RESPONSE Re: Tax Refunds, Dkt. 52 & 53

COMES NOW, the Debtor in the above-captioned case acting through the undersigned attorneys and very respectfully allege and pray as follows:

1. Pending is the Trustee's motion to compel surrender refunds from 2015, 2016 and 2017 and the Court's order to show cause. (Dkt. 52 & 53)
2. The Debtor responds that on this date he has uploaded copies of all of the tax returns requested to the Trustee. In all, he had \$3,988 in refunds.
3. Regarding the refunds, Debtor informs that they were used to cover the extraordinary costs of caring for his advanced and aggressive case of prostate cancer. He has been battling the symptoms of cancer for the past several years and is now in a full-fledged war with the disease. Likewise, to the extent he may have earned a few extra dollars in any of those years they were put mostly towards his failing health. Furthermore, Debtor also had to contribute to the extraordinary expenses of the funerals of his father and his mother in 2017 and 2018, respectively.
4. This is not a sob story to justify using the refunds. Evidence of these facts and expenses have also been provided to the Trustee. As seen, life can be merciless and expensive beyond the scope of a formulaic means test or an unreliable Schedule J. However, Debtor continues to fund the Chapter 13 plan in the hopes of attaining the discharge of his debts.
5. Therefore, Debtor prays notice be taken of this response and that his use of the refunds be ratified in accordance with, and for the good reasons provided, in this response.

Wherefore, Debtor prays to be deemed in compliance with the tax refund requirement and the Court's order to show cause.

CERTIFICATE OF SERVICE

I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends notification of such filing to all those who have registered for receipt of notice by electronic mail, including the US Trustee and the Chapter 13 Trustee; other interested parties listed in the creditor matrix having made an electronic appearance in the case shall also receive electronic notice.

RESPECTFULLY SUBMITTED in Arecibo, Puerto Rico, this 22nd day of October, 2018.

/s Edwin Matos Maldonado

EDWIN MATOS MALDONADO

USDC 226403

FELIX M ZENO GLORO

USDC 124212

PO BOX 1945 ARECIBO P.R. 00613

TEL: 787-879-1760; FAX: 880-2756

tribunal@zenogloro.com

14-06937-BKT13 LUIS MIGUEL ROBLES BERRIOS
Case type: bk Chapter: 13 Asset: Yes Vol: v Bankruptcy Judge: BRIAN K. TESTER
Date filed: 08/25/2014 Date of last filing: 10/22/2018 Plan confirmed: 11/07/2014

Creditors

BANCO POPULAR DE PUERTO RICO
BANKRUPTCY DEPARTMENT (3993751)
PO BOX 366818 (cr)
SAN JUAN PR 00936-6818

Baxter Credit Union
Bankruptcy Department (4007651)
PO Box 8133 (cr)
Vernon Hills IL 60061

BAXTER ECU
400 NORTH LAKEVIEW PARKW (3987198)
VERNON HILLS, IL 60061 (cr)

BAXTER ECU
340 N MILWAUKEE AVE. (3987199)
ATTN: BANKRUPTCY (cr)
VERNON HILLS, IL 60061

BAXTER EMPLY CR UNION
1425 LAKE COOK RD (3987200)
DEERFIELD, IL 60015 (cr)

BP-VISA
GPO BOX 3228 (3987201)
SAN JUAN, PR 00936 (cr)

COOP A/C MANATI
PO BOX 30562 (3987202)
MANATI, PR 00674-8516 (cr)

DTOP
PO BOX 41269 (3987203)
SAN JUAN, PR 00940-1269 (cr)

EASTERN AMERICA INSURANCE CO
PO BOX 9023862 (4463706)
SAN JUAN PR 00902 (cr)

EMPRESAS BERRIOS INC
P.O. BOX 674 (3987204)
CIDRA, PR 00639 (cr)

FREDDY N CORTES
HC 04 BOX 16071 (3987205)
MOCA, PR 00676 (cr)

LAKEVIEW LOAN SERVICING, LLC.
425 Phillips Blvd (4092554)
Ewing, NJ 08618 (cr)

Loancare, LLC

3637 Sentara Way Virginia Beach, VA 23452	(4341246) (cr)
Portfolio Recovery Associates, LLC PO Box 41067 Norfolk, VA 23541	(4475837) (cr)
Quantum3 Group LLC as agent for MOMA Funding LLC PO Box 788 Kirkland, WA 98083-0788	(4441526) (cr)
SUN WEST MORTGAGE CO I 18303 GRIDLEY RD CERRITOS, CA 90703	(3987206) (cr)
Sun West Mortgage Company, Inc.	(4033989) (cr)
SYNCB/EMPRESAS BERRIOS PO BOX 11623 NEWARK, NJ 07101-4623	(3987207) (cr)
SYNCB/SAMS CLUB PO BOX 965005 ORLANDO, FL 32896	(3987208) (cr)
SYNCB/SAMS CLUB ATTENTION: BANKRUPTCY DEPARTMENT PO BOX 103104 ROSWELL, GA 30076	(3987209) (cr)
Synchrony Bank c/o Recovery Management Systems Corp 25 SE 2nd Ave Suite 1120 Miami FL 33131-1605	(4045690) (cr)
THD/CBNA PO BOX 6497 SIOUX FALLS, SD 57117	(3987210) (cr)
THD/CBNA CITICORP CREDIT SERVICES/ATTN:CENTRALIZE PO BOX 20507 KANSAS CITY, MO 64195	(3987211) (cr)

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